

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Veeken Chaglassian

23 CV 02414

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

Twitter, Inc.

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

RECEIVED
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NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☐ **Federal Question**

☒ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, Veeken Chaglassian, is a citizen of the State of
(Plaintiff's name)

New York

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____.

If the defendant is a corporation:

The defendant, Twitter, Inc., is incorporated under the laws of
the State of Delaware
and has its principal place of business in the State of California
or is incorporated under the laws of (foreign state) _____
and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

First Name	Middle Initial	Last Name
Veeken		Chaglassian
4 Deepdene Road		
Street Address		
Forest Hills	NY	11375
County, City	State	Zip Code
9179913849	veeken77@gmail.com	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	Twitter, Inc.						
	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%;">First Name</td> <td style="width: 50%;">Last Name</td> </tr> </table>	First Name	Last Name				
First Name	Last Name						
	<table border="0" style="width: 100%;"> <tr> <td colspan="3">Current Job Title (or other identifying information)</td> </tr> <tr> <td colspan="3">1355 Market Street, Suite 900</td> </tr> </table>	Current Job Title (or other identifying information)			1355 Market Street, Suite 900		
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1355 Market Street, Suite 900							
	<table border="0" style="width: 100%;"> <tr> <td colspan="3">Current Work Address (or other address where defendant may be served)</td> </tr> <tr> <td style="width: 50%;">San Francisco</td> <td style="width: 20%;">CA</td> <td style="width: 30%;">94103</td> </tr> </table>	Current Work Address (or other address where defendant may be served)			San Francisco	CA	94103
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Defendant 2:							
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County, City	State	Zip Code					

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: Twitter website/appDate(s) of occurrence: Mid November, 2019 (probably the 14th)**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

1 Plaintiff (hereafter P.) had been a registered user of Defendant's (hereafter D.) social media platform since some time in 2014. Plaintiff's user account allowed him to post content, interact with other users, and store personal information.

2 On or about 14 Nov 2019, without any prior notice or warning, Defendant unilaterally deleted Plaintiff's user account and withheld all of his user data — including posts, messages, and personal information. The email address (veeken77@gmail.com) to which the acct was linked was even made available, not the user handle though (@loglog_vc).

3 Plaintiff attempted to establish contact with Defendant to inquire about the reason for his account's deletion and to retrieve his user data, but to no avail. Plaintiff's numerous requests through the platform's customer support channel were left unanswered (which entailed opening up new twitter accounts for no other purpose than to inquire about the deletion). Defendant provided no means of direct communication.

4 Plaintiff then retained the services of a lawyer licenced in New York (Brian K. Payne), who issued a formal letter to Defendant in late Aug 2022 demanding the return of Plaintiff's user data and an explanation for the deletion of his account. Defendant never acknowledged the receipt of the letter or provided a response.

5. Plaintiff believes that Defendant's actions violate its user agreement, which

expressly prohibits the deletion of user accounts and the withholding of user data without notice or a valid reason. P. further believes that D.'s actions constitute a breach of its duty of care towards its users and a deliberate attempt to challenge him into having to retain a lawyer simply to get a copy of his data.

6. This last costs money/time & worst of all ensnared the P. into having to entertain all sorts of possibilities to explain the outcome, which through his writings elsewhere & on Twitter itself (w/ a different account) only got him further involved into something that over time has induced his total bewilderment & has compelled him to report it all to the FBI. It's up to the latter to determine whether the sum total of the irregularities at work (far too numerous to list here but which lead back to the "branch point" as created by the D.'s deletion of the Plaintiff's account) warrants a full blown investigation.

(The P. appreciates that the language of this bullet point is not explicit enough; if the court requires it, he understands he will have to delve deeper into the facts, in the process citing all parties he deems relevant—be it ISPs, phone carriers, social media accts, everything that develops the pattern of evidence, including major fortune 500 companies.)

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Given the apparent absurdity of the D.'s taking such senseless legal & reputational risk (no doubt it is well aware of my case), the P. can only conclude that nothing short of his life & career prospects have been & most crucially *had been* in balance. In this framework, the deletion of his account "when push came to shove" set into motion something which had been (has been) keeping him from doing anything with his life for *at least a decade*—the totality of what this means in terms of "thwarted effort" can be made precise (too long to list here). Putting aside what this has cost him physically (another long entry, this time into the circumstances surrounding persistent sleep deprivation), the entirety of his economic and societal potential has since been capped.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

PLEASE SEE SUPPLEMENTAL PAGE ATTACHED TO THIS FORM

SUPPLEMENTAL PAGE**RELIEF:**

Plaintiff is seeking monetary damages in the amount of 20 million dollars for what's implied by Defendant's tortious conduct in light of the veritable economic blockade of his life going back (conservatively) some 10 years. For if Plaintiff could have simply had access to loglog_vc's account data without fear of its having been stripped of critical evidence, he would have initiated many multi-million dollar lawsuits across a gamut of highly prominent industrial accounts on Twitter who had provably taken interest in his *anonymous account* for one reason or another, which had thus made it clear to him over time that he was a known variable being manipulated towards ends completely disjoint from what would have allowed him to excel socioeconomically all those years. Defendant's telling silence on the seizure and bad faith challenge to Plaintiff to pursue these means makes plain that the account has forever been compromised, thus making it impossible for Plaintiff to pursue said lawsuits.

Case:

VEEREN CHALASSIAN vs TWITTER

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

March 23 2023

Dated
Veeken


Plaintiff's Signature
Chaglassian

First Name
4 Deepdene Road

Middle Initial

Last Name

Street Address
Forest Hills, NY

NY

11375

County, City
917-991-3849

State

Zip Code

veeken77@gmail.com

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.